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Attorney for Defendant
Stephon Whitney

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

UNITED STATE OF AMERICA,

Plaintiff,

v.

STEPHON WHITNEY,

Defendant.

Case No. 21-cr-0002-JAD-NJK

**SECOND SUPPLEMENTAL
SENTENCING MEMORANDUM**

Yi Lin Zheng, counsel for defendant Stephon Whitney, hereby files this second supplemental sentencing memorandum in conjunction with the sentencing memorandum (ECF #41) and supplemental sentencing memorandum (ECR #42) respectfully requesting a sentence of 28 MONTHS as sufficient, but not greater than necessary to achieve the goals of sentencing.

SUPPLEMENTAL EXHIBITS IN AID OF SENTENCING

Attached hereto, please find a list of additional exhibits in support of Mr. Whitney's arguments in mitigation of sentence:

- O.** Letter from C. Fletcher, Unit Manager at Nevada Southern Detention Center, stating Mr. Whitney is a detainee in good standing;
- P.** Certificates of Completion for successfully completing:
 - Skillsoft: Receiving Feedback, June 27, 2022;
 - Skillsoft: Uncovering and Utilizing Your Talents and Skills, June 27, 2022;
 - Skillsoft: Take a Deep Breath and Manage Your Stress; June 27, 2022;

- Skillsoft: Solving Problems: Generating and Evaluating Alternatives, June 27, 2022;
- Skillsoft: Reaching Sound Conclusions, June 27, 2022;
- Skillsoft: Planning an Effective Presentation, June 27, 2022;
- Skillsoft: Making and Carrying Out Tough Decisions, June 27, 2022;
- Skillsoft: The Art of Staying Focus, June 27, 2022;
- Skillsoft: Understanding Unconscious Bias, June 27, 2022;
- Skillsoft: Overcoming Unconscious Bias in the Workplace, June 20, 2022;
- Skillsoft: Overcoming Your Own Unconscious, June 20, 2022;
- Skillsoft: Managing Pressure and Stress to Optimize Your Performance, June 18, 2022;
- Skillsoft: Interaction with Customers, June 16, 2022;
- Skillsoft: Establishing Self-Confidence for Life, June 16, 2022;
- Skillsoft: Ensuring Successful Presentation Delivery, June 15, 2022;
- Skillsoft: Difficult People: Why They Act That Way and How to Deal with Them, June 15, 2022;
- Skillsoft: Cultivating Relationships with Your Peers, June 14, 2022;
- Skillsoft: Choosing and Using the Best Solution, June 14, 2022;
- Skillsoft: Building Your Presentation, June 13, 2022;
- Skillsoft: Become a Great Listener, June 13, 2022;
- Skillsoft: Time Management, June 11, 2022;
- Skillsoft: Substance Abuse Education, June 11, 2022;
- Skill Based Education, June 10, 2022;
- Presentation Skills, June 10, 2022;
- My SWOT – How to Use Your Knowledge, June 9, 2022;
- Identification Package, June 8, 2022;
- Job Readiness, June 8, 2022;
- Healthy Coping Skills, June 7, 2022;
- Health Education, June 6, 2022;
- Financial Literacy; June 6, 2022;
- Family and Community Reunification, June 4, 2022;
- Expectations and Outcomes, June 3, 2022;
- Exercising, June 2, 2022;
- Entrepreneurship, June 2, 2022;
- Contemporary Technology Skills – v2, June 2, 2022;
- Conflict Resolution, June 1, 2022;
- Career Resources, May 31, 2022;
- Basic Education, May 31, 2022;
- Behavior Change, May 31, 2022; and
- Anger Management, May 30, 2022.

1 DATED: October 31, 2022.

2 Respectfully submitted,

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4 By: /s/ Yi Lin Zheng

5 Yi Lin Zheng, NV #10811

6 Vegas Golden Law

7 Attorney for Stephon Whitney

8 **CERTIFICATE OF ELECTRONIC SERVICE**

9 The undersigned hereby certifies that she is an employee of the Vegas Golden Law and
10 is a person of such age and discretion as to be competent to serve papers.

11 That on the 30th day of November, 2022, she served an electronic copy of this **SECOND**
12 **SUPPLEMENTAL SENTENCING MEMORANDUM** by electronic service (ECF) to the
13 persons named below:
14

15 JASON FRIERSON
16 United States Attorney
17 DANIEL COWHIG
18 Assistant United States Attorney
19 501 Las Vegas Blvd. South
20 Suite 1100
21 Las Vegas, NV 89101

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/s/ Yi Lin Zheng

Employee of Vegas Golden Law